

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Tharp,

v.

Acacia Communications, Inc., et al.,

Civil Action No. 1:17-cv-11504-WGY
(LEAD DOCKET NO.)

**STIPULATION AND ~~PROPOSED~~ ORDER REGARDING THE APPOINTMENT
OF LEAD PLAINTIFFS AND THE APPROVAL OF LEAD COUNSEL**

WKW Partners Fund I, LP (“WKW”), Hui Zhang (“Zhang”), and Chris Kebler (“Kebler”) (the “Movants”), by and through their respective counsel, for good cause, hereby stipulate as follows:

WHEREAS, on August 14, 2017, plaintiff Steven Tharp commenced this litigation by filing a class action complaint for violations of the federal securities laws captioned *Tharp v. Acacia Communications, Inc., et al.*, Case No. 1:17-cv-11504-WGY (the “Tharp Action”);

WHEREAS, on August 16, 2017, plaintiff Zhang filed a class action complaint for violations of the federal securities laws captioned *Zhang v. Acacia Communications, Inc., et al.*, Case No. 1:17-cv-11518 (the “Zhang Action”);

WHEREAS, on September 7, 2017, plaintiff Kebler filed a class action complaint for violations of the federal securities laws captioned *Kebler v. Acacia Communications, Inc., et al.*, Case No. 1:17-cv-11695-WGY (the “Kebler Action”);

WHEREAS, on October 13, 2017, plaintiff Rina Rollhaus (“Rollhaus”) filed a class action complaint for violations of the federal securities laws captioned *Rollhaus v. Acacia Communications, Inc., et al.*, Case No. 1:17-cv-11988(the “Rollhaus Action”);

WHEREAS, WKW and Zhang together filed a motion for consolidation of these related cases, their appointment as lead plaintiff, and approval of their selection of lead counsel (ECF No. 27);

WHEREAS, four other individuals also moved to be appointed lead plaintiff (ECF Nos. 21, 24, 28, 31) but then subsequently filed notices withdrawing their motions and/or stating their non-opposition to WKW and Zhang’s motion (ECF Nos. 39, 40, 41, 49);

WHEREAS, Kebler filed an opposition to WKW and Zhang's lead plaintiff motion and requested that the Court appoint him as lead plaintiff and approve his selection of lead counsel (ECF No. 44);

WHEREAS, during a status conference held on November 1, 2017, the Court ordered counsel for WKW and Zhang and counsel for Kebler to meet and confer and then notify the Court as to the status of appointment of lead plaintiff on November 8, 2017 (ECF No. 50);

WHEREAS, on November 7, 2017, the Court entered an Order consolidating the Tharp Action, the Zhang Action, the Kebler Action, and the Rollhaus Action under lead case number 1:17-CV-11504-WGY (ECF No. 51); and

WHEREAS, having met and conferred through their respective counsel, WKW, Zhang, and Kebler hereby request that the Court appoint each of them as Co-Lead Plaintiffs for the putative Class and approve their selection of Glancy Prongay & Murray LLP and Robbins Geller Rudman & Dowd LLP as Co-Lead Counsel, and Block & Leviton LLP as Liaison Counsel, for the putative Class;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO APPROVAL BY THIS COURT, by the Movants, through their respective counsel of record, as follows:

1. Pursuant 15 U.S.C. §78u-4(a)(3)(B), WKW, Zhang, and Kebler are appointed as Co-Lead Plaintiffs to represent the interests of the putative Class.
2. Pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v), Glancy Prongay & Murray LLP and Robbins Geller Rudman & Dowd LLP are appointed as Co-Lead Counsel, and Block & Leviton LLP is appointed as Liaison Counsel, for the putative Class.

IT IS SO STIPULATED.

Dated: November 8, 2017

BLOCK & LEVITON LLP

/s/ Jason M. Leviton

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CERTIFICATE OF SERVICE

I, Jason M. Leviton, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Jason M. Leviton
Jason M. Leviton

IT IS SO ORDERED.

DATED: November 9, 2017

William G. Young
HON. JUDGE WILLIAM G. YOUNG
UNITED STATES DISTRICT JUDGE